

Washington National Guard (WNG) Armory, Toppenish
4-260103

These comments are based on review of the two draft September 1992 reports (Limited Site Characterization; and Interim Product Recovery Measures under projects 626121 and 626386) and the August 12, 1992, UST Closure and Site Assessment Report prepared by Burlington Environmental Inc.

The reports and sampling data for TPH/BTEX strongly indicate that the leak is from the 500 gallon Tank T2-E which contained heating oil used for the buildings. In accordance with 40 CFR 280.12 tanks used for storing heating oil for consumptive use on the premises where stored are not regulated underground storage tanks.

However, under Section 2.3.3.2 (Groundwater) of the Limited Site Characterization report there is a discussion that indicates unfiltered water samples contain lead in excess of the Washington State Model Toxics Control Act (MTCA) standard of 0.005 ppm at levels from 0.012 - 0.290 ppm, whereas all of the filtered water samples are below the MTCA standard. The soil samples analyzed for lead were all below the MTCA standard of 250 ppm. NOTE: The MTCA standards for lead applies to **unfiltered** water samples unless the site assessor determines that filtered water samples are more representative.

In conclusion, it appears that the leak occurred from tank T2-E, a non-regulated UST. However, the final report should document whether leaded gasoline has been used in any of the tanks in the past in addition to the inference that the lead is naturally occurring. Any additional discussion justifying the acceptability of filtered water samples for lead should be presented too. Also, EPA should encourage WNG to continue with preparation of the beneficial use of ground water survey and to implement the free product recovery system using the passive hydrocarbon oil-absorbent recovery units. In addition, it is noted that TPH was detected in the ground water monitoring well (MW-7) located approximately 50 feet upgradient from Tank T2-E and that a potential upgradient off-site source of contamination could not be ruled out. Therefore, it is recommended that the WNG install monitoring wells to determine if contaminants are coming from off-site.

EPA Region 10 Comments 1/28/93-2:10P
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USEPA REG



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From: HAROLD SCOTT (HSCOTT)
To: RCUTLER
Date: Friday, January 22, 1993 9:43 am
Subject: Toppenish Armory (4-260103)

Hello Robert-

The attached file contains my initial comments in regards to the Armory. Please let me know if this is the type of format and comments that would be useful to you when I review these LUST Site Assessments. Let's discuss when you have time.

Thanks,
Harold

CC: JCABREZA

Files: C:\WP51\ARMORY